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14 IN THE UNITED STATES DISTRICT COURT
15
16 EASTERN DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,
18
19 v.
20 YAN CHEN,
21
22 Plaintiff,
23
24 Defendant.

25 CASE NO. 2:23-cr-00069-JAM

26 **STIPULATION REGARDING CONTINUANCE
27 OF SENTENCING; FINDINGS AND ORDER**

28 DATE: June 4, 2024

TIME: 9:00 a.m.

COURT: Hon. John A. Mendez

16 **STIPULATION**

17 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
18 through defendant's counsel of record, hereby stipulate as follows:

19 1. By previous order, this matter was set for sentencing on June 4, 2024.
20 2. The government and defense agree that sentencing should be postponed for the following
21 reasons: to permit the defendant time to meet her obligations in the plea agreement. By this stipulation,
22 the parties now move to re-set the matter for sentencing on **October 22, 2024, at 09:00 a.m.**, and
23 request that the Court set the following schedule:

24 a) The Probation Interview has been completed;
25 b) The draft PSR will be completed on or before **September 10, 2024**;
26 c) Informal objections to the presentence investigation report ("PSR") will be
27 completed on or before **September 24, 2024**;
28 d) A final PSR shall be filed by the probation officer on or before **October 1, 2024**;

1 e) Formal objections to, and motions for correction of, the PSR shall be filed on or
2 before **October 8, 2024**;

3 f) Replies to objections to, and motions for correction of, the PSR shall be filed on
4 or before **October 15, 2024**;

5 g) Sentencing memoranda shall be filed on or before **October 15, 2024**.

6 IT IS SO STIPULATED.

7 Dated: May 14, 2024

PHILLIP A. TALBERT
United States Attorney

10 /s/ ROGER YANG
ROGER YANG
Assistant United States Attorney

12 Dated: May 14, 2024

13 /s/ SHAWN SALEHIEH
SHAWN SALEHIEH
14 Counsel for Defendant
Yan Chen

16 **ORDER**

17 IT IS SO FOUND AND ORDERED.

19 Dated: May 15, 2024

/s/ John A. Mendez
20 THE HONORABLE JOHN A. MENDEZ
21 SENIOR UNITED STATES DISTRICT JUDGE